

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
NORTHERN DIVISION

IVA SCHMIDT,	)	
	)	Cause No: 2:18-cv-00057NCC
Plaintiff,	)	
	)	
vs.	)	
	)	
AUDRAIN COUNTY CRISIS	)	
INTERVENTION SERVICES INC.,	)	
d/b/a OUR SAFE PLACE	)	
	)	
Defendant.	)	

**JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

Comes now Plaintiff Iva Schmidt, and Defendant Audrain County Crisis Intervention Services Inc., by and through respective counsel, and, pursuant to Fed.R.Civ.P. Rule 26(c), jointly and respectfully move this Court for entry of an agreed protective order governing the disclosure of "confidential information," as defined therein, during this litigation. In support, the state the following:

1. It has been determined that confidential or proprietary information, such as medical records, personnel records and/or information concerning non-parties, etc., is likely to be produced and/or elicited during the discovery phase of this litigation;
2. The Parties believe that the entry of a protective order is needed to expedite and facilitate discovery and to prevent unwarranted disclosure of the confidential or proprietary information;
3. This motion is made in good faith to facilitate cooperation in discovery and is not intended to harass, annoy or vex, or for any other improper purpose.

Wherefore, the Parties jointly and respectfully request the Court approve and enter the Parties' agreed protective order. A proposed order granting such relief is attached to this motion as Exhibit A and is incorporated herein by reference

Respectfully submitted,

/s/ Sarah Jane Hunt

Sarah Jane Hunt, 63899MO

Thomas E. Kennedy, III

Law Offices of Thomas E. Kennedy, III, L.C.

906 Olive St., Ste. 200

St. Louis, MO 63101

(314) 872-9041

[sarahjane@tkennedylaw.com](mailto:sarahjane@tkennedylaw.com)

**Attorneys for Plaintiff**

/s/ Beth Boggs (by consent)

Beth C. Boggs, #43089MO

Boggs, Avellino, Lach & Boggs, L.L.C.

9326 Olive Blvd., Suite 200

St. Louis, MO 63132

(314) 726-2310

[bboggs@balblawyers.com](mailto:bboggs@balblawyers.com)

**Attorneys for Defendant**